

# **EXHIBIT H**

(Excerpts from transcript of Del Rosso deposition -  
redacted)

1 MR. NEUMAN: Objection to form. Lacks  
2 foundation. Scope.

3 THE WITNESS: I'm not aware of other  
4 evidence or discussions that were going on in  
5 that trial.

6 I mean, what I was asked, I answered.

7 BY MR. BEHRE:

8 Q. What about Paul Robinson? When is the  
9 last time you spoke with him?

10 MR. NEUMAN: Objection. Scope.

11 THE WITNESS: I can't remember. 2020,  
12 maybe.

13 BY MR. BEHRE:

14 Q. And how do you know him?

15 MR. NEUMAN: Same objection.

16 THE WITNESS: He was a consultant that  
17 I called on from time to time.

18 BY MR. BEHRE:

19 Q. He was a consultant to you?

20 A. A consultant to many people I used,  
21 along did others. As did others.

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24 MR. NEUMAN: Objection to form. Vague  
25 and ambiguous.

1 THE WITNESS: Project Nariman.

2 COURT REPORTER: Say it again, please.

3 THE WITNESS: Nariman, N-A-R-I-M-A-N.

4 COURT REPORTER: Thank you.

5 BY MR. BEHRE:

6 [REDACTED]  
7 [REDACTED]

8 MR. NEUMAN: Objection. I'm going to  
9 object on the basis that it calls for  
10 information protected by the attorney-client  
11 privilege and instruct him not to answer.

12 MR. BEHRE: I'm simply asking what the  
13 mean -- name means to him.

14 MR. NEUMAN: To extent that the name  
15 has meaning associated with work that Dechert  
16 was doing for RAK, then that would be  
17 privileged, and I'm instructing him not to  
18 answer.

19 MR. BEHRE: In theory, it would be.  
20 Are you representing that's the case?

21 MR. NEUMAN: I'm rep- -- I'm  
22 representing that to the extent it was part  
23 of Dechert's representation of RAK, it's not  
24 our privilege to waive. RAK holds that  
25 privilege.

1 A. (Indiscernible due to overtalking.)

2 MR. NEUMAN: Same objection.

3 COURT REPORTER: Hold on.

4 MR. BEHRE: You have to let the  
5 witness answer now.

6 MR. NEUMAN: I'm objecting before he  
7 answers.

8 MR. BEHRE: Come on.

9 THE WITNESS: Okay. Sorry.

10 MR. BEHRE: (Indiscernible due to  
11 overtalking.)

12 MR. NEUMAN: Objecting on the basis of  
13 form.

14 You can answer.

15 THE WITNESS: Am I --

16 MR. NEUMAN: Just wait until I have an  
17 opportunity to object.

18 THE WITNESS: Okay. Am I answering  
19 this question?

20 MR. NEUMAN: Yes.

21 THE WITNESS: Project Concord?

22 MR. BEHRE: Yes.

23 THE WITNESS: It's unrelated to that,  
24 the engagement with Dechert.

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1 BY MR. BEHRE:

2 Q. Okay. Project Endeavor, are you  
3 familiar with that project?

4 MR. NEUMAN: Objection. Scope.

5 THE WITNESS: Again, unrelated to my  
6 engagement with Dechert.

7 BY MR. BEHRE:

8 [REDACTED]  
9 [REDACTED]

10 MR. NEUMAN: Objection to form. Lacks  
11 foundation. Scope.

12 THE WITNESS: I really don't know.

13 BY MR. BEHRE:

14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]

21 Q. But you've just testified it doesn't  
22 involve your work for Dechert; correct?

23 A. It does not.

24 [REDACTED]

25 MR. NEUMAN: Objection. Scope.

1 CyberRoot?

2 A. Well, I imagine so because that's the  
3 one that I used.

4 Q. What about Wickr? Have you ever used  
5 Wickr, W-I-C-K-R?

6 A. A couple of years ago. It's an awful  
7 app.

8 Q. How many years ago?

9 A. Sort of around 2012, that sort of time  
10 period.

11 Q. What about Silent Circle? Have you  
12 ever used that?

13 A. I have, yeah.

14 Q. Did you use that with CyberRoot?

15 A. I don't know. I don't remember.

16 Q. And what about good old-fashioned  
17 e-mail? Did you ever communicate with CyberRoot on  
18 e-mail?

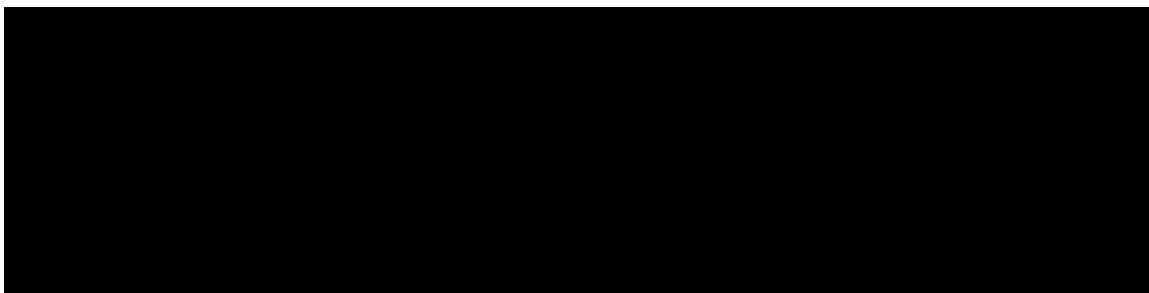
19 A. No.

20 Q. Why did you find it necessary to use  
21 Signal and not e-mail?

22 A. First of all, calls between us are  
23 free, and it seemed like the most secure option to  
24 communicate.

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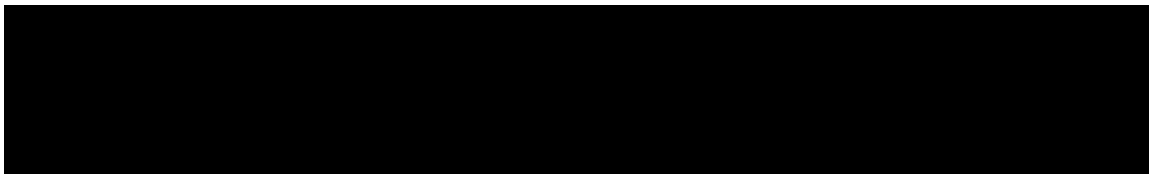
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MR. NEUMAN: Objection on the basis  
that it would call for information protected  
by attorney-client privilege.

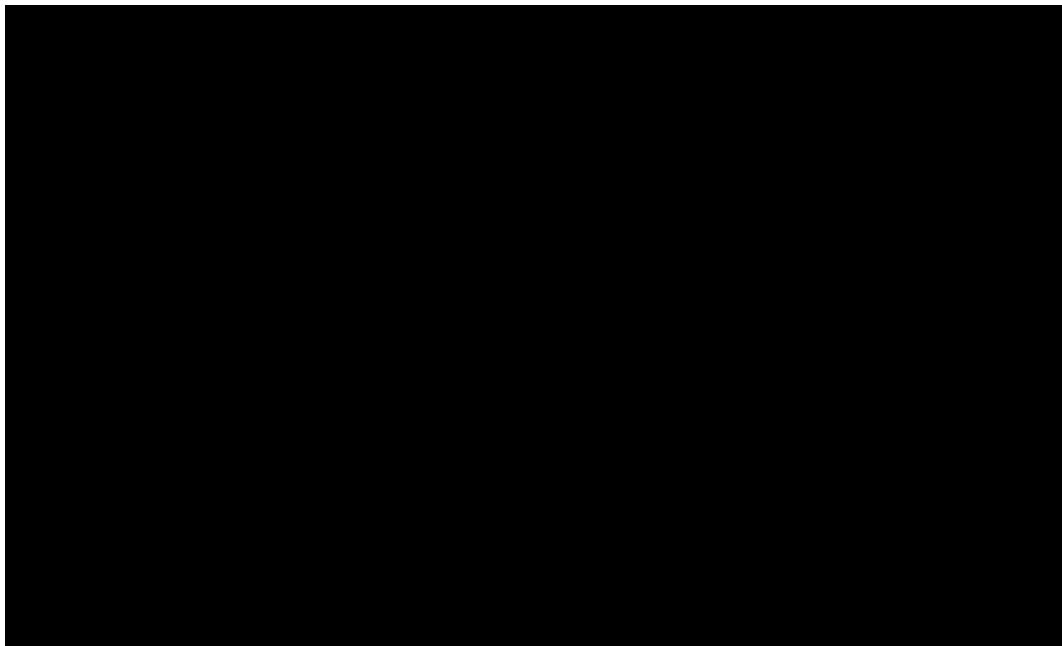
Instruct you not to answer on that  
basis.

BY MR. BEHRE:



A. I say --

MR. NEUMAN: Other than what was  
comm- -- what was on behalf of Dechert in its  
representation of RAK.



1 BY MR. BEHRE:

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13 MR. NEUMAN: Objection. Same  
14 objection.

15 Instruct you not to answer.

16 BY MR. BEHRE:

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20 A. You'll have to go back over that  
21 question.

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1 THE WITNESS: I don't remember  
2 the -- this conversation, but it looks to me  
3 like it's telling him not to cover anything up.

4 BY ATTORNEY BEHRE:

5 Q. Do you see further down the entry that reads,  
6 and I quote:

7 "From my end, other than two  
8 matters involving cyber security  
9 review/monitoring, including the  
10 current one, I see the rest of the  
11 invoices are billed against ORM.  
12 Some of those go back to when Craig  
13 worked with you," end quote.

14 Do you see that?

15 A. I do.

16 Q. What is project ORM?

17 ATTORNEY NEUMAN: Same objection  
18 regarding authenticity.

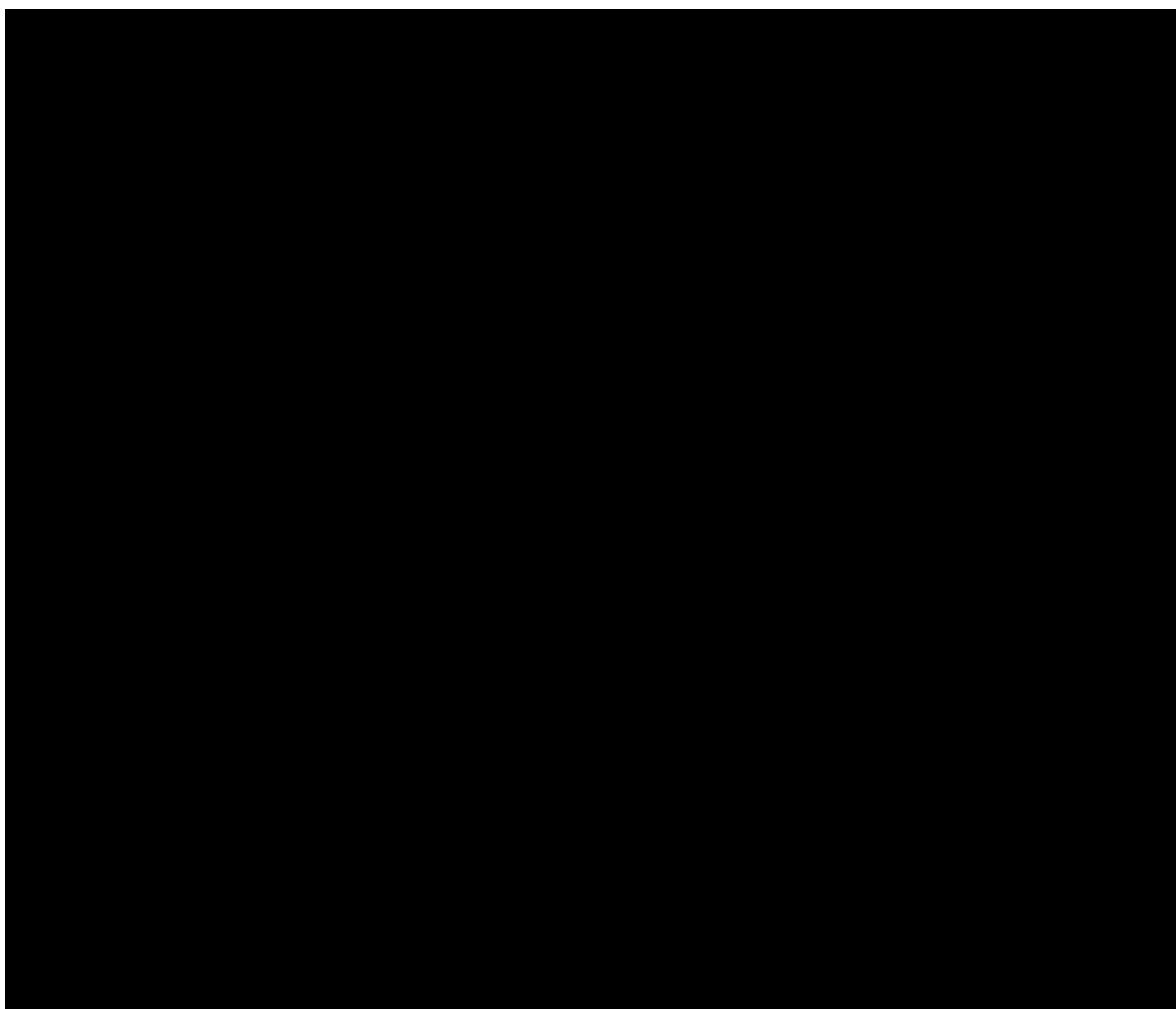
19 THE WITNESS: Well, I'm not sure there  
20 is a project ORM. It just means online  
21 reputation management.

22 BY ATTORNEY BEHRE:

23 Q. So that's an abbreviation for online reputation  
24 management?

25 A. Yes.

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Q. So why is it that with regard to your relationship with Aditya Jain you're unable to remember even the big picture circumstances of that relationship?

ATTORNEY NEUMAN: Objection. Form. Argumentative.

THE WITNESS: I think it would be with any -- I don't know that you're asking me big picture stuff, detail. I have an impaired memory. You know, I have trouble remembering stuff.